

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DARREN M. NANCE,

Plaintiff,

v.

CITY OF NEWARK, NEWARK
POLICE DEPARTMENT, et al.

Defendants.

CIVIL ACTION NO. 97-CV-6184
(DMC) (CCC)

**VERDICT SHEET
AS TO DAMAGES**

1. Now that you have found that Plaintiff has proved by a preponderance of the evidence that the City of Newark caused his employment to be terminated by retaliating against him for exercising his right to petition the Government in violation of the First Amendment of the Constitution and in violation of NJ Law Against Discrimination.

Please continue to 1(a) or (b)

a. Please state the amount that will fairly compensate Plaintiff for any injury which he actually sustained as a result of the City of Newark's conduct which shall include physical harm, emotional and mental harm and lost wages(income).When calculating lost wages(income) you should consider mitigating as I have instructed you.

Answer: \$ 350,000
(Fill in Dollar Figure)

b. If you find that there is no compensatory damages, you shall award nominal damages of \$1.00 as permitted by law.

Answer: \$ _____
(Fill in Dollar Figure)

If you completed 1(a) please proceed to question 2(a).
If you completed 1(b) you have completed your deliberations.

2.a. Do you find that Plaintiff demonstrated by a clear and convincing evidence that the conduct of the City of Newark was especially egregious?

☒ Yes ☐ No

*If you answered NO, you have completed your deliberations.
If you answered YES, please continue to Question 2(b).*

2.b. Do you find that Plaintiff demonstrated by a clear and convincing evidence that "upper management" employees of the City of Newark actually participated in, or were willfully indifferent to, the wrongful conduct?

☒ Yes ☐ No

*If you answered NO you have completed your deliberations.
If you answered YES to both these questions, please continue to Question 2(c).*

2.c. What amount of punitive damages should be awarded against the City of Newark?

Answer: \$ 250,000
(Fill in Dollar Figure)

When you have completed your deliberations, your foreperson should date and sign the verdict form below.

DATED this 25 day of June, 2010.

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